

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)	
)	
R. SHANE CARROLL,)	Case No. 14-12227-R
)	Chapter 11
Debtor-in-Possession.)	

**MOTION FOR ORDER AUTHORIZING PRIVATE SALE OF PROPERTY
OF THE ESTATE FREE AND CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES
AND NOTICE OF HEARING DATE**

R. Shane Carroll, Debtor-in-Possession, gives notice that by virtue of 11 U.S.C. Section 363(b) and (f), applicable state law, and Bankruptcy Rules 6004(a), (c) and (f), 9014, and 2002(a) and (c), that he will sell, at private sale, free and clear of liens, claims and encumbrances, to Gary Rudick, or his assigns, the Estate's interest in the following described property:

Squeeze Chute

(the "Property").

Background Information

1. R. Shane Carroll ("Carroll") filed a Voluntary Petition under Chapter 11 of the United States Bankruptcy Code on October 7, 2014 and since such date has continued in possession of his property and operation of his business as Debtor-in-Possession.
2. The Property is an asset of Carroll's bankruptcy estate.
3. The Property is part of the collateral of Farm Service Agency ("FSA"). FSA has filed a proof of claim in the amount of \$527,072.12.
4. The FSA consents to this proposed sale.

Terms of the Sale

5. The Debtor shall sell the Property to Gary Rudick, or his assigns, for the sum of \$6,000.00.

6. The Debtor shall sell the Property free and clear of all liens, claims and encumbrances. The lien of FSA shall attach to the proceeds of the sale with the same priority and legal effect as it had in and to the Property itself. If other liens are determined to be valid, they shall attach to the proceeds of the sale.

7. The will pay the proceeds of the sale directly to FSA.

8. The Property will be transferred by Bill of Sale.

9. Debtor is selling the Property "as is, where is" without any warranties or representations, expressed or implied.

Hearing on Proposed Sale

10. A hearing has been set for February 25, 2015, at 3:30 p.m. o'clock before the Honorable Dana L. Rasure, United States Bankruptcy Judge, in Courtroom No. 1, of the United States Bankruptcy Court, 224 S. Boulder, Tulsa, Oklahoma, 74103, to consider any objections.

11. Objections to this sale must be filed and served not less than seven (7) days before the date set for the hearing. If no objection is timely filed or served, the Court may strike the hearing and grant the requested relief without further notice or a hearing

Wherefore, R. Shane Carroll, Debtor-in-Possession, moves this Court for authority to sell the Property as set forth above.

Respectfully submitted January 27, 2015.

RIGGS, ABNEY, NEAL
TURPEN, ORBISON & LEWIS

s/ Karen Carden Walsh

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ATTORNEYS FOR DEBTOR-IN-POSSESSION